

REMARKS/ARGUMENTS

Claims 1-18 stand in the present application, claims 1, 8 and 14 having been amended. Reconsideration and favorable action is respectfully requested in view of the above amendments and the following remarks.

In the Office Action, the Examiner has rejected claims 8-9 and 14-15 under 35 U.S.C. § 102(b) as being anticipated by Rosenberg '373, has rejected claims 1-3, 6 and 13 under 35 U.S.C. § 103(a) as being unpatentable over Rosenberg '530 in view of Rosenberg '373, has rejected claim 4 under 35 U.S.C. § 103(a) as being unpatentable over Rosenberg '530 in view of Rosenberg '373 and further in view of Chafe, has rejected claim 5 under 35 U.S.C. § 103(a) as being unpatentable over Rosenberg '530 in view of Rosenberg '373 and in view of Chafe and further in view of Wang, has rejected claim 7 under 35 U.S.C. § 103(a) as being unpatentable over Rosenberg '530 in view of Rosenberg '373 and further in view of Wang, and has rejected claims 10-11 and 16-17 under 35 U.S.C. § 103(a) as being unpatentable over Rosenberg '373 in view of Niemeyer et al. Applicants respectfully traverse the Examiner's §§ 102 and 103 rejections of the claims.

Independent claims 1, 8, and 14 have been amended to more clearly require a "connectionless network" (e.g., the Internet or the WWW, see present specification at page 1, lines 20 and 21) interposed between the locations (i.e., the "one location" and the "current location"). For this reason, data packets with positional data are used for transmission within the network between these locations.

The "connectionless network" limitation of the present claims is clearly absent from Rosenberg '373 which instead describes a control system (10) comprising a computer (12) an

interface device (14) and bus (24). See Rosenberg '373 at Figure 1, and column 7, lines 39-55. More particularly, computer (12) and interface device (14) are connected by serial data bus (24), i.e., a point-to-point connection link of the type mentioned in the present specification at page 1, lines 21-22, as compared to the connectionless network of the present invention. Moreover, there is no use of data packets in the Rosenberg '373 point-to-point system, so this requirement of the present claims is also missing from the cited art.

The use of components having different processing speeds may result in timing issues. The Rosenberg '373 system deals with this by using a "time measure" which is derived from determining the time elapsed since the receipt of the last positional data. See Rosenberg '373 at column 18, lines 19-24. This is not the same as using a measure of network latency between two locations, as required by the present claims. Thus, Rosenberg '373 also fails to disclose or suggest the use of a network latency measurement in the transmission of data packets between the locations connected by the required connectionless network.

For all of the above described reasons, the present claims patentably define over Rosenberg '373.

Rosenburg '530 describes a connectionless network system using data packets. However, the disclosure is also not concerned with delays suffered within a system where a connectionless network interconnects components at two different locations. Instead, Rosenberg '530 relates to a manner of using graphically displayed information associated with stored feedback data received by a client from a server. See Rosenberg at, *inter alia*, the Abstract, column 2, line 25 to column 4, line 20, and claims 1-40. Accordingly, even assuming *arguendo* that those ordinarily skilled in the art would have been led to combine Rosenberg '373 and Rosenberg '530, Applicant's invention still would not have resulted because neither

reference teaches or suggests using a measure of network latency of the signals transmitted between locations connected by a connectionless network, as required by the present claims.

Accordingly, independent claims 1, 8, and 14 and their respective dependent claims patentably define over Rosenberg '530 and Rosenberg '373 taken singly or in combination.

Regarding the rejection of claim 4 in view of the above discussed prior art and Chafe, it has already been pointed out that Rosenberg '373 (which describes a way of dealing with delay within a single system including a point-to-point link, which does not involve the use of a network latency measurement) and Rosenberg '530 (which is a networked system but which does not concern itself with delay) fails to describe a networked system suffering from latency using a network latency measurement. Chafe, not being in the area of haptics, describes methods to discover network latency using RTT and pinging techniques. Applicant respectfully submits that the skilled person, having already found a "solution" in the combination of the two Rosenberg references by determining time elapsed since the last-received positional data – would not be motivated to look for another solution, i.e., to use a measure of network latency as described in Chafe. Absent the hindsight of the present application there would have been no reason or motivation to modify Rosenberg '373 – there is simply no hint or suggestion in Rosenberg '373 or Rosenberg '530 to modify the disclosed systems in the manner suggested by the Examiner. Accordingly, dependent claim 4 patentably defines over Rosenberg '530, Rosenberg '373, and Chafe taken singly or in any combination.

Similarly, with regard to dependent claims 5 and 7, the skilled person is unlikely to refer to Wang for combining with any of the previously discussed references. This is because there is little motivation in looking to a teaching in the completely different area of surgical robotics, and also because none of the earlier documents, whether separately or in combination,

provide any suggestion to the skilled person to find and combine into the mix the method alleged by the examiner to exist in Wang. Accordingly, dependent claim 5 patentably defines over Rosenberg '530, Rosenberg '373, Chafe, and Wang, taken singly or in any combination.

With regard to dependent claims 10-11, and 16-17, it is respectfully submitted that Niemeyer, contrary to the Examiner's allegation, is not in the same field as the present invention. As discussed above, the combination of the Rosenberg documents would not result in Applicant's invention less the aspect of the environmental simulator and the skilled person is would not have been led to combine Niemeyer which is not in the haptics field. Moreover, the portions of the cited reference identified by the Examiner, do not teach or suggest that signals defining a preferred current position (within the meaning of, e.g., claim 10) are generated by the slave simulator. In any event, it should be clear that Niemeyer does not solve the deficiencies noted above with the respect to the other cited art. Accordingly, dependent claims 10-11 and 16-17 patentably define over the cited art taken singly or in any combination.

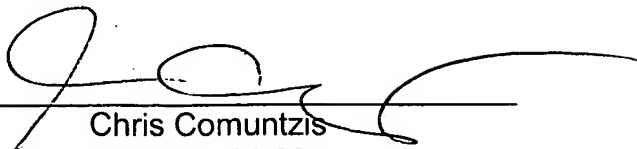
Therefore, in view of the above amendments and remarks, it is respectfully requested that the application be reconsidered and that all of claims 1-18, standing in the application, be allowed and that the case be passed to issue. If there are any other issues remaining which the Examiner believes could be resolved through either a supplemental response or an Examiner's amendment, the Examiner is respectfully requested to contact the undersigned at the local telephone exchange indicated below.

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Respectfully submitted,

NIXON & VANDERHYE P.C.

By: _____


Chris Comuntzis
Reg. No. 31,097

CC:Imr
901 North Glebe Road, 11th Floor
Arlington, VA 22203-1808
Telephone: (703) 816-4000
Facsimile: (703) 816-4100